



Memorandum # 17/2004

Commonwealth of Massachusetts | Public Employee Retirement Administration Commission
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MEMORANDUM

TO: All Retirement Boards

FROM: Joseph I. Martin, Deputy Executive Director

RE: Tobacco Company List

DATE: April 8, 2004

On October 22, 1997 PERAC Memo #37/1997 informed you of the adoption of Chapter 119 of the Acts of 1997. That statute prohibits retirement systems from making any new investments in stocks, securities, or other obligations of any company which derives more than 15% of its revenue from the sale of tobacco products. On December 18, 1997 PERAC sent Memo #48 regarding the implementation of Chapter 119 and the first Tobacco Company List.

Enclosed please find a Tobacco Company List dated April 1, 2004. This list replaces any other Tobacco Company List previously sent to your board and is effective upon receipt by the retirement boards. Most of these companies appeared on previous lists and such investments were prohibited from the time the companies first appeared on the list. Please forward a copy to your investment advisors or inform them that this list is available on the PERAC Home Page under the Investment Unit's 2004 Memo Index.

As part of its audit process, PERAC will assess the portfolio of each board to determine compliance. That review will determine if the board, after January 13, 1998, has purchased stock, securities, or other obligations of any company which derives more than 15% of its revenue from the sale of tobacco products. In the event a portfolio is not in compliance, the board must bring the portfolio into compliance by divesting in a prudent manner. Prior to taking any action, the board shall consult with PERAC.

In applying the statute to pooled funds, PERAC will assess the 15% rule against the entire pool as the board is purchasing shares in the pool not the individual holdings of the pool. Thus a pooled fund, if in violation of this standard, will be included on the list.

If you have any questions, please call Robert Dennis, Investment Director at 617-666-4446 ext. 922.

TOBACCO COMPANY LIST

April, 1 2004

COMPANY

COUNTRY

7-Eleven, Inc.	United States
Alec Bradley Cigar Corporation	United States
Altria Group, Inc.	United States
AMCON Distributing Company	United States
Caribbean Cigar Company	United States
Carolina Group	United States
Cyco.Net, Inc.	United States
Dairy Mart Convenience Stores, Inc.	United States
DCGR International Holdings	United States
DIMON, Inc.	United States
Evolve One, Inc.	United States
Grand Havana Enterprises, Inc.	United States
Havana Group, Inc.	United States
Havana Republic, Inc.	United States
iCommerce Group Inc.	United States
Loews Corporation	United States
M&F Worldwide Corporation	United States
Niche Resources, Inc.	United States
Noble Brands, Inc.	United States
North Atlantic Trading Company	United States
R.J. Reynolds Tobacco Holdings, Inc.	United States
Schweitzer-Mauduit International, Inc.	United States
Signature Brands, Inc.	United States
Standard Commercial Corporation	United States
Star Scientific, Inc.	United States
The Pantry, Inc.	United States
Uni-Marts, Inc.	United States
Universal Corporation	United States
UST Inc.	United States
Vector Group, Ltd.	United States

Nobleza-Piccardo SA

Argentina

Alpha Tobacco Manufacturing Co. Ltd.

Bangladesh

British American Tobacco Bangladesh Co. Ltd.

Bangladesh

Souza Cruz SA

Brazil

COMPANYCOUNTRY

Asenovgrad BT
Blagoevgrad BT
Bulgartabak Holding
Dupnitsa BT
Haskovo BT
Plovdiv BT
Shoumen BT
Sofia BT

Bulgaria
Bulgaria
Bulgaria
Bulgaria
Bulgaria
Bulgaria
Bulgaria
Bulgaria

Rothmans, Inc.
Ultimate Direct, Inc.

Canada
Canada

Compania Chilena de Tabacos SA

Chile

Mudanjiang Hengfeng Paper Co., Ltd.
Shanghai Industrial Holdings

China
China

Compania Colombiana de Tabaco SA

Colombia

Tvornica Duhana Zagreb

Croatia

Philip Morris CR AS

Czech Republic

Skandinavisk Tobakskompagni

Denmark

Eastern Tobacco Company

Egypt

British American Tobacco (Ghana)

Ghana

Hellenic Duty Free Shops S.A.
Karelia Tobacco Co. SA
Keranis Cigarette Company
Papastratos Cigarette SA

Greece
Greece
Greece
Greece

Tabacalera Hondurena

Honduras

Godfrey Phillips India Ltd.
GTC Industries Ltd.
I.T.C. Ltd.
Kothari Products Limited
RTCL Ltd.
VST Industries Ltd.

India
India
India
India
India
India

COMPANYCOUNTRY

Hanjaya Mandala Sampoerna PT	Indonesia
PT B.A.T. Indonesia	Indonesia
PT Bentoel Internasional Investama Tbk	Indonesia
PT Gudang Garam Tbk	Indonesia
Dubek Ltd.	Israel
Jerusalem Cigarette	Israel
Societe Ivoirienne des Tabacs	Ivory Coast
Carreras Group Ltd.	Jamaica
Japan Tobacco Inc.	Japan
International Tobacco & Cigarette Company Ltd.	Jordan
Jordan Tobacco & Cigarette Co. Ltd.	Jordan
Union Tobacco	Jordan
British American Tobacco Kenya, Ltd.	Kenya
British American Tobacco Bhd	Malaysia
JT International Bhd	Malaysia
Grupo Carso, SA de CV	Mexico
Khyber Tobacco Company Ltd.	Pakistan
Lakson Tobacco Company Ltd.	Pakistan
Pakistan Tobacco Co. Ltd.	Pakistan
Sarhad Cigarette Industries Ltd.	Pakistan
Souvenir Tobacco Company Ltd.	Pakistan
Tobacco International Limited	Pakistan
Philippine Tobacco Flue Curing & Redrying Corporation	Philippines
Pazur SA	Poland
Distell Group Ltd.	South Africa
Remgro Limited	South Africa
KT&G Corporation	South Korea
Altadis SA	Spain
Compania de Distribucion Integral Logista, SA	Spain

COMPANYCOUNTRY

Ceylon Tobacco Co. Ltd.

Sri Lanka

Swedish Match

Sweden

Compagnie Financiere Richemont AG

Switzerland

President Chain Store

Taiwan

Taiwan FamilyMart Co., Ltd.

Taiwan

Tanzania Cigarette Company

Tanzania

West Indian Tobacco Company Ltd.

Trinidad and Tobago

British American Tobacco, Plc

United Kingdom

Dickinson Legg Group Plc

United Kingdom

Gallaher Group Plc

United Kingdom

Imperial Tobacco Group Plc

United Kingdom

Molins Plc

United Kingdom

British American Tobacco (Zambia) Plc

Zambia

British American Tobacco Zimbabwe Holdings Limited

Zimbabwe